

AMENDMENT UNDER 37 C.F.R. § 1.111  
Attorney Docket No. A8520/STL000017US1  
U.S. Application No. 09/488,969

## REMARKS

### **I. Introduction**

Pending claims 1-15 have been examined and rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Prinzing, U.S. Patent No. 6,592,628 (hereinafter “Prinzing”). Additionally, the Examiner objects to the specification.

By way of overview, Applicants traverse the rejection of claims 1-15 and overcome the objections to the specification as follows.

### **II. Claim Rejections -- 35 U.S.C. § 102(e)**

Prinzing is fundamentally different from the claimed invention in that it does not relate to “providing prerequisite checking in a system for creating compilations from a plurality of content objects stored in a data repository, each content object comprising a plurality of content entities”, as recited in claim 1 (*see also* claims 6 and 11). In particular, Prinzing does not disclose or suggest that “some of the content entities being prerequisites to others of the content entities” such that “upon addition or removal of a content entity to or from the compilation, [it is determined whether] the content entity has any prerequisite content entities, and if so, . . . the prerequisite content entities [are added or removed]”, as recited in claim 1 (*see also* claims 6 and 11).

To the contrary, Prinzing discloses a method and system that processes the content of a document separately from the information used to describe the structure of the content in the document (Prinzing: Abstract). In Prinzing, a content entity 306 is capable of storing and manipulating (*e.g.*, inserting, deleting, retrieving, etc.) the content stored in a storage area 312

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(Prinzing: col. 3, lines 35-37; col. 5, lines 35-42; and Fig. 3). A separate document entity 304 includes element entities 308, 310 to represent the structure of the document and reference the content stored by the content entity (Prinzing: col. 3, lines 37-39; and Fig. 3). For example, element entity 308 and element entity 310 can be used to describe a text document having two paragraphs (Prinzing: col. 5, lines 11-21).

Thus, Prinzing relates to separating the content storage and structural organization of a document because the integration of these functions in a single software module makes it difficult to replace the content storage routines without affecting other portions of the software application (Prinzing: col. 1, lines 49-63). By facilitating the substitute of content storage routines, an application in Prinzing is able to use a set of content storage routines that is suited to the storage capacities of a particular data processing system running the application (Prinzing: col. 2, lines 50-55; and Fig. 4).

Prinzing does not perform any prerequisite checking. For example, as noted above, Prinzing does not disclose or suggest “providing prerequisite checking in a system for creating compilations from a plurality of content objects stored in a data repository, each content object comprising a plurality of content entities”, as recited in claim 1 (*see also* claims 6 and 11).

The Examiner alleges that Prinzing discloses these features by describing that “the manipulation of content in the storage area includes inserting content in the content entity, removing content from the content entity . . .” and “the information retrieved from the element entities is used to manipulate the content stored in the storage area associated with the content entity” (Office Action: page 4, *citing* Prinzing: col. 2, lines 21-67 and col. 3, lines 27-58).

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The use of a content entity and element entities (of a document entity), as disclosed in Prinzing, does not correspond to prerequisite checking. As illustrated in Fig. 3 of Prinzing, an element entity (*e.g.*, element entity 308) includes information such as a start position and a stop position for accessing content stored in the storage area 312 through content entity 306, for example, to read a string (Prinzing: Fig. 3).

In the prerequisite checking of claim 1, if a content entity is added to or removed from the compilation, it is determined whether the added/removed content entity has any prerequisite content entities. For example, if a content entity A is a prerequisite of a content entity B, the addition of content entity B to the compilation will, through prerequisite checking, result in the automatic addition of content entity A to the compilation. Likewise, the subsequent removal of content entity B from the compilation will result, through prerequisite checking, in the automatic removal of content entity A from the compilation.

Because Prinzing fails to disclose or suggest any such prerequisite checking, claims 1, 6 and 12 are not anticipated by Prinzing. Consequently, claims 2-5, 7-10 and 12-15 are not anticipated by Prinzing, at least by virtue of their dependency.

### **III. Submission of Appendix on CD-R**

Submitted herewith for filing in the present application is a Compact Disc-Recordable (CD-R) having recorded thereon an ASCII text computer program listing prepared in compliance with C.F.R. §1.96, and a duplicate copy of the CD-R. The computer program listing was created and stored on the CD-R in IBM-PC format using a Microsoft Windows operating system. Each CD-R is physically labeled with the title of the invention, the docket/application numbers of the

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application, the creation date of the CD-R and an indication of the inventorship. Two copies of the CD-R are provided (numbered CD #1 of 1 / Copy 1 and CD #1 of 1 / Copy 2, respectively), with each copy containing the file detailed below.

File Contents of CD #1 of 1:

File Name	Files Size	Creation Date
AppendixA.txt	107 KB	5/16/2002

**IV. Formal Matters**

Information Disclosure Statement

The Examiner provides a signed and initialed copy of the Forms PTO/SB/08 submitted with the IDS filed on September 30, 2003, thereby indicating consideration of the references cited therein.

Subsequent to the mailing of the present Office Action, Applicants filed an IDS on January 29, 2004. Consequently, the Examiner is requested to acknowledge consideration of the references cited in this IDS in the next Communication.

Specification

Applicants amend the Abstract such that it does not exceed 150 words. Additionally, Applicants update the information regarding related applications. Consequently, Applicants respectfully request that the Examiner withdraw the objections to the Applicants' specification.

Furthermore, the Examiner's remarks relating to computer program listings appearing in the specification are irrelevant. For example, 37 C.F.R. § 1.96(b)(2)(ii) provides for listings of 60 lines of code or less to be positioned within the specification.

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Claims

Applicants make minor cosmetic amendments to claims 1, 6 and 11. Applicants respectfully submit that these amendments are not intended to narrow the scope of the original claims, but are rather for precision of language and to explicitly recite within the claim what was believed to have already been implicitly defined therein. Accordingly, these amendments do not foreclose application of reasonable equivalents.

**V. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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